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6 Trustee in Bankruptcy

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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 In re

12 EVANDER FRANK KANE,
13 Debtor.

Case No. 21-50028 SLJ
Chapter 7
Hon. Stephen L. Johnson

**STIPULATION TO ENTRY OF ORDER
EXTENDING DATE FOR FILING
COMPLAINT
(11 U.S.C. SECTION 727)**

[No Hearing Requested]

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18 This stipulation is entered into by and between Evander Frank Kane (“Debtor”) and Fred
19 Hjelmset, Trustee in Bankruptcy of the Debtor’s estate (“Trustee”), through their respective
20 counsel.

21 **RECITALS**

- 22 A. On January 9, 2021, the Debtor filed a Voluntary Chapter 7 Petition.
23 B. On January 11, 2021, the Bankruptcy Court issued its “Notice of Chapter 7
24 Bankruptcy Case,” Docket 4 (“Notice”).
25 C. The Notice provides that the deadline for filing complaints against the Debtor for
26 non-dischargeability or denial of discharge is April 5, 2021.

27 **STIPULATION**

28 NOW, THEREFORE, the parties agree as follows:

1. With regard to any complaints that would have to be filed by the Trustee in conformity with Bankruptcy Code Section 727 (11 U.S.C. § 727) and Rule 4004 of the Federal Rules of Bankruptcy Procedure (i.e., discharge of debt) shall be extended for approximately 30 days from the current deadline of April 5, 2021 through and including May 5, 2021.

2. The parties further agree that the new deadline, May 5, 2021, may be further extended by stipulation of the parties.

3. The parties agree to entry of an order in the form annexed hereto as **Exhibit A**.

DATED: March 22, 2021

RINCON LAW LLP

By: /s/ Gregg S. Kleiner

GREGG S. KLEINER

Counsel for FRED HJELMESET,
Trustee in Bankruptcy

DATED: March 22, 2021

FINESTONE HAYES LLP

By: *Stephen D. Finestone*

STEPHEN D. FINESTONE

Counsel for Debtor, EVANDER FRANK KANE

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10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 In re

14 EVANDER FRANK KANE,
15 Debtor.

Case No. 21-50028 SLJ
Chapter 7
Hon. Stephen L. Johnson

**ORDER EXTENDING DATE FOR FILING
COMPLAINT OBJECTING TO
DISCHARGE
(11 U.S.C. SECTION 727)**

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17 Based on the Stipulation to Entry of Order Extending Date for Filing Complaint (11 U.S.C.
18 Section 727) (the "Stipulation") entered into by and between Fred Hjelmset, Trustee in Bankruptcy
19 of the Debtor's estate and Debtor Evander Frank Kane, through their respective counsel,
20 electronically filed on March 22, 2021, as Docket No. _____,

21 IT IS HEREBY ORDERED, as follows:

- 22 1. The Stipulation is approved.
23 2. With regard to the Trustee, the current deadline established by Rule 4004 of the
24 Federal Rules of Bankruptcy Procedure to object to the Debtor's discharge is hereby extended
25 through and including May 5, 2021.

26 *** **END OF ORDER** ***
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EXHIBIT A

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*** *COURT SERVICE LIST* ***

No Court service required.